

UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of:

Records of Facebook account: "andre.williams.3538,"  
Account # 100003208686561 that are stored  
at premises owned, maintained, controlled, or  
operated by Facebook, a company headquartered  
in Menlo Park, California.

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Case No. 17MO21

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B.

The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: 18 U.S.C. Sections 1951(a) and 924(c)(1)(A)(ii)

The application is based on these facts: See attached affidavit.


- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

Brad Simons, FBI Agent  
Printed Name and Title

Sworn to before me and signed in my presence:

Date: March 13, 2017

  
Judge's signature

City and State: Milwaukee, Wisconsin

Honorable David Jones, U.S. Magistrate Judge

AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT

I, Brad Simons, being duly sworn, state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook user ID that is stored at premises owned, maintained, controlled, or operated by Facebook Inc. ("Facebook"), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since 2014. I am currently assigned to the Milwaukee Area Violent Crimes Task Force ("MAVCTF"). My duties as a Special Agent with the FBI include investigating violent crimes such as armed robberies, car jackings, bank robberies, and violent criminal enterprises. I have gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. I have executed numerous warrants to search and seize electronic devices, such as cellular telephones and computers.

3. This affidavit is based upon my personal knowledge, and upon information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. Throughout this affidavit, reference will be made to case agents. Case agents are those federal, state, and local law enforcement officers

who have directly participated in this investigation, and with whom your affiant has had regular contact regarding this investigation. This affidavit is also based upon information gained from interviews with cooperating citizen witnesses, whose reliability is established separately herein.

4. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations of and to make arrests for federal offenses. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18, U.S.C. Sections 1951(a) (Hobbs Act Robbery) and 924(c)(1)(A)(ii) (Use of a Firearm During Crime of Violence) have been committed by Jawan M. SMITH, Andre L. WILLIAMS, Joe T., JOHNSON, Alonzo, L. WILLIAMS, and others yet unknown.

5. I seek authorization to search Facebook's information associated with Andre L. WILLIAMS who is using Facebook user identification number (UID) 100003208686561 and Facebook name andre.WILLIAMS.3538.

#### **PROBABLE CAUSE**

##### **Sprint Store Robbery – 1138 Miller Park Way, West Milwaukee, WI**

6. On Saturday, October 15, 2016, at approximately 7:38 p.m., the Sprint Store located at 1138 Miller Park Way, West Milwaukee, WI 53214 reported an armed robbery. West Milwaukee Police Department officers responded to the scene and interviewed witnesses.

7. Victim employees, D.R. and S.K., stated that two black males entered the store. The first suspect who entered, Subject #1, was armed with a semi-automatic pistol, and covered his face by cinching his hoodie around his face. Subject #1 pointed his pistol at S.K. and escorted S.K. to the break room. Subject #2 entered the store shortly after Subject #1.

8. After escorting S.K. to the break room, Subject #1 struck S.K. on the back of S.K.'s head with Subject #1's pistol. S.K. blacked out for approximately five to ten seconds. After regaining consciousness S.K. heard Subject #1 state, "We want the phones." S.K. also heard one of the suspects say, "You niggers better hurry up or we gonna kill one of you."

9. While entering the break room, D.R. heard one of the suspects state, "Everyone get on the ground." While lying on his stomach, D.R. felt one of the suspects zip tie his ankles together. D.R. was hit on the back of his head two to three times by one of the subjects.

10. The victims described the suspects as follows: Subject #1 is a black male, 6'0" tall, wearing a gray hoodie, and armed with a silver semi-automatic handgun. Subject #2 is described as a black male wearing a black hoodie.

11. Law enforcement review of the video surveillance obtained from the store during the time of the robbery is consistent with the account given by the victim employees.

12. Law enforcement review of the video surveillance further depicts Subject #2 zip tying the ankles of three of the four employees in the break room. Law enforcement has also learned from a review of the police reports prepared in connection with this offense that the subjects obtained a key to unlock cabinets containing the merchandise from one of the store employees. The surveillance video depicts the subjects escorting one of the employees to the sales floor where the subjects unlocked multiple cabinets housing the store's merchandise. The video shows both subjects loading cell phones and tablets into a green or blue bag.

**Sprint Store Robbery – 2706 N. Prospect Ave., Champaign, IL**

13. On Thursday, July 28, 2016, at approximately 7:46 p.m., the Sprint Store located at 2706 N. Prospect Ave., Champaign, IL 61821 was robbed at gun point by two black males, later identified as Andrew NUNN and Thomas JAMES.

14. JAMES was arrested for robbing a Circle K Gas Station located at 581 S. Indiana Ave., Kankakee, Illinois, on August 6, 2016. JAMES was in custody at the Jerome Combs Detention Center in Kankakee, IL. On September 9, 2016, JAMES was interviewed by law enforcement officers about his involvement in the Champaign, Illinois Sprint Store robbery which occurred on July 28, 2016. JAMES signed a waiver of his Miranda rights. During the interview, JAMES admitted to his involvement in the robbery, and admitted to being the gunman. JAMES stated that the gun was a .40 or .45 caliber, and it was real. JAMES obtained the gun from Andrew NUNN. Andre L. WILLIAMS, dropped off JAMES and NUNN at the back of the store. Once JAMES and NUNN were inside the store, NUNN zip tied everyone. JAMES estimated that he and NUNN stole approximately 80 cell phones.

15. JAMES stated that the group drove a silver Monte Carlo and an Isuzu type small SUV to Champaign, from Kankakee. After committing the robbery, the two vehicles pulled over to the side of the highway at which time JAMES and NUNN took the stolen cell phones and loaded them into the SUV driven by Andre L. WILLIAMS. JAMES said the phones were delivered to an individual named "Curley" at a clothing, phone, and convenience store in Harvey, IL, later determined to be "The Connect," located at 15340 Dixie Highway, Harvey, IL 60426. JAMES said that he heard "Curley" paid Andre L. WILLIAMS \$50,600 for the stolen phones. Thomas JAMES was paid \$1,800 for his participation in the robbery.

16. Sprint employee N.A. saw the robbers flee in a grey Monte Carlo. Customer C.C. was in the store at the time of the robbery. C.C. was in the store to purchase a new iPhone 6S with corresponding phone number (217) 550-7475. This cell phone was stolen by JAMES and NUNN during the robbery. The phone was tracked by one of the store employees through the customer's iCloud application. A check with iCloud revealed that the phone was heading north on Highway

57. The Illinois State Police conducted a traffic stop of a silver Monte Carlo. The Monte Carlo was occupied by Randy WILLIAMS and Jaevontae WILLIAMS. The Illinois State Police confirmed that the stolen iPhone with phone number (217) 550-7475 was located in the Monte Carlo. Randy WILLIAMS and Jaevontae WILLIAMS were taken into custody.

17. During the interview of JAMES, JAMES stated that he saw the police pull over the Monte Carlo driven by Randy WILLIAMS and Jaevontae WILLIAMS.

**Sprint Store Robbery – 849 East Chicago St., Coldwater, MI**

18. On Saturday, August 27, 2016, at approximately 7:00 p.m., the Sprint Store located at 849 East Chicago St., Coldwater, MI 49036 reported an armed robbery. The suspects forced the store employees and customers into the store's back room. The suspects ordered everyone to the ground, and bound the victim's wrists and ankles with zip ties. The suspects stole approximately 70 cell phones.

**Sprint Store Robbery – 2120 Missouri Blvd., Jefferson City, MO**

19. On October 21, 2016, at approximately 8:00 p.m., a Sprint Store located at 2120 Missouri Blvd, Jefferson City, MO 65109 was robbed by two black male subjects wearing black zip-up jackets with the hoods pulled tight around their faces. One of the victims present during the robbery described the first subject, Subject # 1, as 6'1" tall, 180lbs, wearing dark clothing with a hood cinched tight around the subject's face, with sunglasses. The suspect brandished a gun, described as a black, semi-automatic large caliber handgun. Subject #1 pointed the gun at the victims, and ordered everyone into the back room. Subject #1 told them to kneel and put their heads down. One of the victims saw a second subject, Subject #2. Subject #2 was described as carrying a black trash bag with no observed weapons. Subject #1 asked the victim where the phones were kept, to which the victim replied, at the front of the store in the cabinet. The victim

began to show Subject #1 where the phones were located. The victim began to walk to the front of the store while Subject #1 stayed behind the victim with a gun pointed to the back of the victim's head. Subject #1 forced the victim to open the cabinet where the phones were kept. Subject #1 then walked the victim back to the bathroom at gunpoint. Subject #1 told the victim to start counting down from twenty. The victims were told that the subjects would not leave until they started the countdown.

20. On October 25, 2016, law enforcement officers were dispatched to 2009 St. Mary's Blvd., Jefferson City, Missouri regarding an abandoned blue Dodge Durango, VIN number 1B4HS28Y6XF659501. This location, 2009 St. Mary's St., is approximately half a mile away from the Sprint Store located at 2120 Missouri Blvd that was robbed four days prior. According to a witness, the Durango had been abandoned between October 21, 2016 and October 22, 2016.

21. During a search of the Dodge Durango, law enforcement officers found black plastic bags, zip ties, black pants, one latex glove, one cigarette butt, and two Red Bull cans. Law enforcement obtained possible DNA swabs from the two Red Bull. Possible DNA swabs were also obtained from the driver's side mirror, driver's side door, steering wheel, and climate control and radio knobs.

22. On October 22, 2016, law enforcement officers in Kankakee, IL were dispatched to CR Auto Group regarding a stolen vehicle. The vehicle was a blue Dodge Durango with VIN number 1B4HS28Y6XF659501, which is the same vehicle that was abandoned a half mile away from Sprint Store robbery in Jefferson City, MO. No broken glass found in the area where the vehicle had been parked. Upon further investigation, law enforcement officers discovered Andre L. WILLIAMS test drove the Dodge Durango for two hours on October 20, 2016, the day before it was stolen. Based upon my training, experience, and familiarity with the investigation, I believe



that Andre L. WILLIAMS duplicated the key for this vehicle and used it during the course of the cell phone store robbery.

**Sprint Store Attempted Robbery – 4758 Calumet Avenue, Hammond, IN**

23. On Saturday, November 12, 2016, Hammond Police Department police officers responded to a suspicious person call at the Sprint cell phone store located at 4758 Calumet Avenue, Hammond, IN 46327. Sprint employee D.W. advised police officers that a suspicious subject entered the store. The subject was described as a black male in his mid to late 20's, approximately 6' to 6'02" tall, thin build, wearing black fitted gloves, black Nike shoes, grey hooded sweatshirt, and black neck warmer over his mouth. The subject had the hood up over his head with the drawstring pulled tight around his face. The subject asked about pre-paid phones, and then exited the store northbound on foot. Another black male subject who was reported to be "looking around and acting suspicious" was observed at the rear of the Sprint store by a customer. Two subjects matching the description provided by D.W. were stopped by officers approximately ½ block from the Sprint store. The individuals were identified as Jawan M. SMITH and Bryant T. TANZY.

24. Officers observed a bulge in the area of SMITH's left pant leg. For officer safety, the officers patted down SMITH and TANZY. SMITH had a large blue canvas type bag with a white colored draw-string which contained white plastic zip ties. TANZY possessed a black handgun later determined to be a BB gun.

25. During an interview with law enforcement, SMITH admitted that he traveled from Kankakee, IL to Hammond, IN with the intent to rob the Sprint cell phone store. SMITH identified Lydia JOHNSON as the ring leader of a robbery crew that was targeting cell phone stores. On November 10, 2016, JOHNSON asked SMITH and TANZY if they wanted to make some money



by committing a robbery. SMITH and TANZY agreed. On November 12, 2016, JOHNSON picked up SMITH and TANZY in her red 2011 Toyota in Kankakee, IL and transported them to Hammond, IN for the purposes of committing a robbery at the Sprint cell phone store.

26. Law enforcement authorities presented SMITH with a photograph of a black female from the Facebook page "Corlissa Johnson." SMITH identified the individual in the photograph as the person he knew as Lydia JOHNSON. On October 23, 2016, the Facebook page under the name "Corlissa Johnson" posted "Need #Worker Hml." Based on my training and experience, I believe this post was used to recruit people, including SMITH, to commit cell phone store robberies.

**Verizon Wireless Robbery – 600 S. Governors Hwy, Peotone, Illinois**

27. On December 29, 2016, at approximately 3:05 p.m., a Verizon Wireless store located at 600 S. Governors Highway, Peotone, IL was robbed at gun point by two black male subjects. A witness waived down a Peotone police officer and gave him a description of two black male subjects, in ski masks, driving a white Jeep Cherokee leaving the store that had driven over a curb at a high rate of speed. The responding officer informed dispatch, and dispatch advised they had just received a call from the Verizon Wireless store, located at 600 S. Governors Highway, Peotone, IL, reporting that the store had just been robbed. The Peotone police officer informed dispatch that he was behind the vehicle that was turning southbound onto 88th Avenue from Wilmington Peotone Road, and the vehicle refused to stop. After losing sight of the vehicle, officers were flagged down by an unknown witness who stated the vehicle continued southbound into an open field. The vehicle was later located unoccupied, in a ditch. Law enforcement officers on scene stated they had two subjects in custody under a bridge, just west of that location on route 45/52. Subsequently, law enforcement authorities identified the driver of the vehicle as Tevin

WILLIAMS, and the passenger as Tavares THOMAS. Both subjects were taken into custody at the Kankakee County Sheriff's Office.

28. On December 29, 2016, law enforcement officers interviewed Tavares THOMAS at the Kankakee County Sheriff's Office. When questioned about Andre L. WILLIAMS' involvement in the recent cell phone store robberies, Tavares THOMAS stated he was aware that Andre WILLIAMS was involved in the Champaign, IL Sprint Store robbery that occurred on July 28, 2016. Tavares THOMAS also admitted to being involved in the Sprint Store robbery carried out on July 7, 2016, in Alton, Illinois. Tavares THOMAS stated Andre WILLIAMS provided a Chrysler 200, with Georgia license plates used in the Alton, Illinois robbery. Previously, a Chrysler 200 had been found abandoned on Route 140 the day after the Alton, Illinois robbery. Tavares THOMAS stated that he had been to "The Connect" before, and has witnessed two cellular telephone transactions in the past (referring to stolen cell phones being sold to Curley).

29. On December 29, 2016, Tevin WILLIAMS was interview by law enforcement officers about his involvement in the Peotone, IL Sprint Store robbery. Tevin admitted to his involvement in the Sprint Store robbery in Peotone earlier that day. When questioned about the Bourbonnais, IL Verizon Wireless robbery located at 2080 N St., Hwy 50, Bourbonnais, Illinois which occurred on October 30, 2016, Tevin WILLIAMS stated that he heard Andre L. WILLIAMS was involved.

#### **Information Provided by Confidential Informant**

30. On October 20, 2016, the Milwaukee FBI received information from the Alton Police Department that a Sprint cell phone store in Alton, IL, was robbed in a very similar manner to the robbery that occurred in West Milwaukee on October 15, 2016. In addition to Alton, IL, the Milwaukee FBI learned that several other cities across the Midwest have experienced cell phone

store robberies with a nearly identical method of operation. Law enforcement agents have been in contact with a detective in Kankakee, IL who has been working with a confidential informant (hereinafter "CI") who has knowledge about the robbery crew committing cell phone store armed robberies utilizing weapons and zip ties.

31. Other law enforcement officers who have worked with the CI regard him as reliable. The CI has worked with law enforcement for three years and has provided information that has led to over ten arrests, the seizure of multiple firearms, and the seizure of drugs including crack cocaine and heroin. Information provided by the CI has also led to the arrest of multiple suspects involved in the recent cell phone store robberies in Alton, Illinois, and Champaign, Illinois. The CI is compensated monetarily for information provided, and has been convicted of two traffic offenses, one assault, and three criminal damage to property offenses.

32. The CI viewed portions of the surveillance video from the October 15, 2016, Sprint Store robbery in West Milwaukee, WI. The CI identified Joe T. WILLIAMS and Alonzo L. WILLIAMS as the subjects who committed the armed robbery.

33. The CI identified Andre L. WILLIAMS as the leader of the robbery crew. According to the CI, Andre L. WILLIAMS recruits individuals to commit cell phone store armed robberies. The CI is aware that Andre L. WILLIAMS is the leader of the robbery crew because the CI was recently present when Andre L. WILLIAMS made mention of this information in a conversation.

34. Based on information provided by the CI, law enforcement in Illinois obtained and executed a search warrant that authorized the search of "The Connect," a cell phone store located in Harvey, IL, that is believed to be purchasing stolen cell phones. Video surveillance seized from "The Connect" depicts the suspects from the Alton, Illinois robbery entering "The Connect." The

suspects were carrying a large blue bag. A review of the surveillance video from the Sprint phone store in Alton, Illinois, displayed the robbers putting the stolen merchandise into a large blue bag.

35. In addition, the CI told law enforcement authorities that Andre L. WILLAAMS used the phone number (312) 468-1199, a Sprint phone, during the time of the West Milwaukee robbery.

### **Geolocation Analysis of Cell Phones**

36. Law enforcement authorities obtained call detail records with tower and sector information from June 28, 2016 through November 25, 2016 for telephone number (312) 468-1199. On the afternoon of October 15, 2016, (312) 468-1199 made several voice calls. Based on the cell towers that the phone was connected to during the voice calls, law enforcement determined that this phone traveled approximately 300 miles roundtrip from Kankakee, IL to Milwaukee, WI on October 15, 2016.

37. During the time of the West Milwaukee robbery, (312) 468-1199 conducted an 18 minute and 27 second call with phone number (779) 236-3609, a Verizon phone. During this call, (312) 468-1199 was connected to a cell phone tower approximately 1/10 of a mile from the location of the West Milwaukee robbery, which was the closest Sprint cell tower to that location.

38. Law enforcement obtained call detail records with tower and sector information from June 1, 2106 through November 1, 2016 for telephone number (779) 236-3609. On the afternoon of October 15, 2016, (779) 236-3609 made several voice calls. Based on the cell towers that the phone was connected to during the voice calls, law enforcement determined that this phone traveled approximately 300 miles roundtrip from Kankakee, IL to Milwaukee, WI on October 15, 2016. During the 18 minute and 27 second call with (312) 469-1199, (779) 236-3609 was connected to a cell phone tower approximately 1/10 of a mile from the location of the West

Milwaukee robbery, which was the closest Verizon cell tower to that location.

39. On September 21, 2016, Jawan M. SMITH called 911 from cell phone number (779) 236-3609 to report shots fired. Kankakee Police Department officers were dispatched to 2052 E. Patrick Ave., Kankakee, IL 60901 in response to the 911 call. Officers spoke with two individuals at the residence, and found one bullet in the food pantry and three bullet casings near the rear of the residence. Jawan M. SMITH, one of the persons in the residence at the time of the shooting, told police officers that his phone number was (779) 236-3609.

40. Through a review of the call detail records for phone numbers (312) 468-1199 and (779) 236-3609, law enforcement determined that both phones traveled approximately 785 miles round trip from Kankakee, IL to Jefferson City, MO on October 21, 2016. During the time of the Jefferson City robbery, (312) 468-1199 conducted an 8 minute and 55 second call with phone number (779) 236-3609. During this call, (779) 236-3609 was connected to a cell phone tower less than one mile from the location of the Jefferson City robbery, which was the closest Verizon cell tower to that location. During this call, (312) 468-1199 was connected to a cell phone tower less than one mile from the location of the Jefferson City robbery. Based upon my review of the five months of call records reviewed by law enforcement, the only calls made or received by (312) 468-1199 in the Jefferson City, MO area occurred on the day of the Jefferson City robbery. Based upon my review of the five months of call records reviewed by law enforcement, the only calls made or received by (779) 236-3609 in the Jefferson City, MO area occurred on the day of the Jefferson City robbery.

41. Through a review of the call detail records for phone number (312) 468-1199, law enforcement determined that on July 28, 2016, this phone traveled approximately 160 miles round trip from Kankakee, IL to Champaign, IL. Approximately fifteen minutes before the Champaign,

IL robbery, (312) 468-1199 was connected to a cell phone tower less than 1.5 miles from the robbery. Based upon cell tower information, cell phone number (312) 468-1199 placed four calls in the vicinity of the robbery location in the hour before the robbery. On the day of the Champaign, IL robbery, (312) 468-1199 conducted 23 text and voice calls with (815) 507-6374. After WILLIAMS' arrest for his involvement in the Champaign, IL robbery, during an interview with law enforcement Jaevontae WILLIAMS admitted that his phone number was (815) 507-6374.

42. Through a review of the call detail records for phone number (312) 468-1199, law enforcement determined that this phone traveled approximately 435 miles round trip from Kankakee, IL to Coldwater, MI on August 27, 2016. During the time of the Coldwater, MI robbery, (312) 468-1199 was connected to a cell tower approximately three miles away from the Coldwater robbery. In total, (312) 468-1199 placed 10 voice calls within an 82 minute window around the time of the robbery. From the five months of call records reviewed by law enforcement, the only calls made or received by (312) 468-1199 in the Coldwater, MI area occurred on the day of the Coldwater robbery.

**Prior Review of Facebook – Andre L. WILLIAMS and Jawan SMITH**

43. Through a public search of Facebook, law enforcement found a Facebook page that I believe is used by Andre L. WILLIAMS. The Facebook page, which has a username of “andre.WILLIAMS.3538,” and Facebook user identification number (UID) 100003208686561, contains pictures of an individual that matches known pictures of Andre L. WILLIAMS. In addition, the user of this account lists a home address in Kankakee, Illinois and a hometown of Kankakee, Illinois. Based on records checks, Andre L. WILLIAMS currently lives in Kankakee, IL. The Facebook account believed to be used by Andre L. WILLIAMS also lists “DroMrsteal Yogirl WILLIAMS” as a brother. “DroMrsteal Yogirl WILLIAMS” contains pictures of an

individual that matches known pictures of Alonzo L. WILLIAMS, who is Andre L. WILLIAMS' brother.

44. A search warrant was obtained for the Facebook user identification number (UID) 100003208686561 and Facebook name andre.WILLIAMS.3538. Pursuant to the search warrant, Facebook provided records from October 1, 2016 – February 1, 2017. The Facebook username andre.WILLIAMS.3538 has a Facebook name of Andre WILLIAMS. A review of the search warrant results obtained from Facebook revealed that Facebook user Andre WILLIAMS conducted a Facebook conversation with Facebook user Joe Campbell. A portion of the conversation from October 7, 2016 is below:

Andre WILLIAMS: Joe what's your number bro  
Joe Campbell: 815 278 3672...what's good  
Joe Campbell: You just called me  
Andre WILLIAMS: Naww  
Joe Campbell: Oh OK  
Andre WILLIAMS: Lock my number in 312-468-1199  
Joe Campbell: I locked you in

45. On November 6, 2016, the Facebook user Andre WILLIAMS conducted a Facebook conversation with Facebook user Sonja Franks-Bennett. A portion of the conversation is below:

Sonja Franks-Bennett: nephew what's your number so i can out it down for pick up  
Andre WILLIAMS: 312-468-1199

46. In two separate conversations, Facebook user Andre WILLIAMS confirmed that his phone number was (312) 468-1199, which is the same phone number that was in the vicinity of the West Milwaukee, Jefferson City, Champaign, and Coldwater Sprint Store robberies. Based on the information provided by the CI and the information obtained from the Facebook records, I believe Andre L. WILLIAMS was the user of phone number (312) 468-1199.



47. On October 6, 2016, the Facebook user Andre WILLIAMS conducted a Facebook conversation with Facebook user BossBino La'Flare. A portion of the conversation is below:

BossBino La'Flare: Ima let u no  
BossBino La'Flare: 500 fa 32G sprints  
BossBino La'Flare: 7 fa 128 850 fa 252

48. Based on my training, experience, and familiarity in investigating violent robbery crews, I believe BossBino La'Flare sent Andre WILLIAMS a price list for various cell phones. I believe BossBino La'Flare informed Andre WILLIAMS that BossBino La'Flare would pay \$500 for 32G iPhone 7's, \$700 for 128G iPhone 7's, and \$850 for 252G iPhone 7's. Based on my experience, I know that buyers of stolen cell phones will frequently send price lists to the individuals stealing the phones.

49. Through a public search of Facebook, law enforcement located a Facebook page that I believe is used by SMITH. The Facebook page, which has a username of "jawns2," and Facebook user identification number (UID) 100000879082632, contains pictures of an individual that matches known pictures of SMITH. In addition, on March 28, 2012, a Facebook user posted "Happy B-Day to u enjoy you day it's a speicAl day it's your day." On March 29, 2012, the user of the Facebook page jawns2 posted "thanks." Based upon a review of records, I know SMITH's birthday is March 28, 1998.

50. A search warrant was obtained for the Facebook user identification number (UID) 100000879082632 and Facebook name jawns2. Pursuant to the search warrant, Facebook provided records from October 1, 2106 – January 27, 2017. The Facebook username jawns2 has a Facebook name of Jay Smith. A review of the search warrant results obtained from Facebook revealed that Facebook user Jay Smith conducted a Facebook conversation with Facebook user Mycole Jordan on October 15, 2016. A portion of the conversation is below :

Jay Smith: Wassup were u going to be at so I can come get u for HC  
Mycole Jordan: I'm gonna be behind the bricks  
Mycole Jordan: But still hmu to make sure  
Mycole Jordan: What time  
Jay Smith: 6:00  
Mycole Jordan: Ok  
Mycole Jordan: I'll be ready  
Mycole Jordan: Tell me what's the plan for tonight  
Jay Smith: We go to the dance after tht we go out to eat catch a movie or just chill and turn up  
Mycole Jordan: Okay you got the tickets  
Jay Smith: Not yet  
Jay Smith: Wht u wearing tonight  
Jay Smith: I might be a lil late to get u becuz im out of town handleing something  
Jay Smith: Whts ur number  
Mycole Jordan: 7792367977

51. Based on a review of the Kankakee High School website, law enforcement determined that Kankakee High School held their Homecoming dance on October 15, 2016. I believe Jawan SMITH was initially planning on attending the Homecoming dance with Facebook user Mycole Jordan on October 15, 2016. A review of the call detail records obtained for (779) 236-3609 reveal that approximately 12 minutes after Facebook user Mycole Jordan told Facebook user Jay Smith that her phone number was (779) 236-7977, (779) 236-3609 called (779) 236-7977. This was the first phone call between these two numbers in the phone records reviewed by law enforcement.

52. The Facebook conversation between Jay Smith and Mycole Jordan continued on October 16, 2016:

Mycole Jordan: You stood me up  
Jay Smith: Definitely didn't I tried calling u and everything bt I wanna make it up to u if don't have plans I was wondering can I take u out tomorrow  
Mycole Jordan: Yeaah my phone died but I ain't on shit now just smoking hmu when you can

53. Based on a review of the call records for (779) 236-3609, (779) 236-3609 called (779) 236-7977 18 times on October 15-16, 2016. Based on the information Jawan SMITH

provided to law enforcement on September 21, 2016, and based on the information obtained from the Facebook records, I believe Jawan SMITH was the user of phone number (779) 236-3609, which was in the vicinity of the West Milwaukee and Jefferson City robberies.

54. Based on my training and experience, I know criminals regularly post images and other information regarding their criminal activity on Facebook. Criminals will also regularly communicate with their co-conspirators using Facebook. I believe there is probable cause to believe that information regarding the West Milwaukee, Jefferson City, Coldwater, and Champaign robberies will be found on the Facebook page used by Andre L. WILLIAMS. I therefore believe that expanding the search of Facebook records associated with Andre L. WILLIAMS' Facebook account will provide additional evidence of the enumerated crimes.

55. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

56. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

57. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual

Facebook users by sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the request, then the two users will become “Friends” for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user’s account includes a list of that user’s “Friends” and a “News Feed,” which highlights information about the user’s “Friends,” such as profile changes, upcoming events, and birthdays.

58. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

59. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

60. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

61. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

62. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

63. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

64. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

65. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

66. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs ("blogs"), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

67. The Facebook Gifts feature allows users to send virtual "gifts" to their friends that appear as icons on the recipient's profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other "pokes," which are free and simply result in a notification to the recipient that he or she has been "poked" by the sender.

68. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

69. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

70. Facebook uses the term "Neoprint" to describe an expanded view of a given user profile. The "Neoprint" for a given user can include the following information from the user's

profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications.

71. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

72. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

73. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal



conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's "Neoprint," IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to "tag" their location in posts and Facebook "friends" to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

74. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

#### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

75. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

#### **CONCLUSION**

76. Based on the forgoing, I request that the Court issue the proposed search warrant.

77. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States in the Eastern District of Wisconsin that has jurisdiction over the offense being investigated.” Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the following Facebook Account:

| NAME              | FACEBOOK<br>IDENTIFICATION<br>(UID) | FACEBOOK NAME       |
|-------------------|-------------------------------------|---------------------|
| Andre<br>WILLIAMS | 100003208686561                     | andre.WILLIAMS.3538 |

including information that is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered in Menlo Park, California.

## ATTACHMENT B

### Particular Things to be Seized

#### I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc. ("Facebook"), including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- (a) All contact and personal identifying information, including for user "andre.WILLIAMS.3538" with user ID 100003208686561: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- (b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;
- (d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification

numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

- (e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;
- (f) All "check ins" and other location information;
- (g) All IP logs, including all records of the IP addresses that logged into the account;
- (h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- (i) All information about the Facebook pages that the account is or was a "fan" of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Facebook searches performed by the account;
- (l) All information about the user's access and use of Facebook Marketplace;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;

- (p) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of Title 18, U.S.C. Sections 1951(a) (Hobbs Act Robbery) and 924(c)(1)(A)(ii) (Use of a Firearm During Crime of Violence) involving Andre L. WILLIAMS since June 1, 2016, including, for the user ID identified on Attachment A, information pertaining to the following matters:

- (a) Communications between known subjects. Communications of between known subjects and unknown subjects. Pictures of clothing and firearms used during captioned investigation. Preparatory steps taken in furtherance of the robbery.
- (b) Communications related to photos/attachments. Communications related to travel. Communications related to dates.
- (c) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- (d) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (e) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).

(f) The identity of the person(s) who communicated with the user ID

100003208686561 regarding matters relating to the aforementioned violations of  
the United States Code.